

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF OKLAHOMA**

HULL'S ENVIRONMENTAL SERVICES, INC.,)
)
)
Plaintiff,)
)
)
vs.) Case No. <u>6:24-cv-00479-JAR</u>
)
UNITED STATES OF AMERICA ex rel SECRETARY OF ARMY/U.S. ARMY CORPS OF ENGINEERS; et al.)
)
)
Defendants/Cross-Plaintiffs.)

UNOPPOSED MOTION FOR COUNSEL TO APPEAR REMOTELY

COMES NOW the Defendant/Cross-Plaintiff, ARGONAUT INSURANCE COMPANY, by and through its undersigned counsel, pursuant to Fed.R.Civ.P. 7 and the Local Rule 7.1 of the United States District Court for the Eastern District of Oklahoma, and for its Unopposed Motion for Counsel to Appear Remotely would respectfully state as follows:

Following this Court's Status Conference on May 20, 2025, this Court issued an order setting an in-person Scheduling Conference for 1:30pm on June 23, 2025 at the federal courthouse in Muskogee, OK. ECF no. 40, p. 1.

On both June 21, 2025 and June 22, 2025, the undersigned counsel for ARGONAUT INSURANCE COMPANY, Michael I. Goldman, Esq., will be hosting his daughter's bat mitzvah in Medford, MA, as well as other various long-planned celebrations for many out-of-town family members.

However, since there are no direct flights from New England to Tulsa, OK, the only way to be certain that the undersigned could appear in person on June 23, 2025 would be to leave New England the day before, June 22, 2025, right in the middle of the long-planned festivities. Further,

additional counsel for Argonaut Insurance Company, Stephen Melendi, is unavailable to appear that day due to a previously scheduled family trip overseas.

Therefore, the undersigned counsel for ARGONAUT INSURANCE COMPANY, Michael I. Goldman, Esq., asks to be allowed to appear at the June 23, 2025 Scheduling Conference by video.

The undersigned has conferred with all counsel for those parties who have made an appearance in this matter, and none have any objection to the relief sought.

Dated: May 27, 2025

Respectfully submitted,

/s/ Michael I. Goldman

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ATTORNEY FOR DEFENDANT,

ARGONAUT INSURANCE COMPANY

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 27th day of May, 2025, a true and correct copy of the foregoing document was filed using the Court's electronic filing/notification system (ECF) to all known parties of record.

/s/ Michael I. Goldman

/s/ Stephen A. Melendi

CERTIFICATE OF COMPLIANCE

The undersigned hereby certifies that on the 20th day of May, 2025, the undersigned conferred with counsel for all those parties who have appeared in this matter and that there is no opposition to the relief sought herein.

/s/ Michael I. Goldman

/s/ Stephen A. Melendi